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*Co-Lead Counsel for the Classes and
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Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,
Brandon Vera, and Kyle Kingsbury*

[Additional counsel appear on signature page]

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045 RFB-(PAL)

**DECLARATION OF KEVIN E. RAYHILL
IN SUPPORT OF PLAINTIFFS' MOTION
TO CHALLENGE ZUFFA'S PRIVILEGE
DESIGNATION**

1 I, Kevin E. Rayhill, declare and state as follows:

2 1. I am an attorney at the Joseph Saveri Law Firm, Inc. ("JSLF"), Co-Lead Counsel for
3 the Classes and Attorneys for Individual and Representative Plaintiffs Cung Le, Nathan Quarry, Jon
4 Fitch, Luis Javier Vazquez, Brandon Vera, and Kyle Kingsbury in the above-captioned matter. I am a
5 member in good standing of the State Bar of California, and have been admitted to this Court *pro hac*
6 *vice*. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If
7 called as a witness, I could and would testify competently to them.

8 2. I make this declaration in support of Plaintiffs' motion to challenge Defendant's
9 designation of attorney-client privilege with respect to one certain email communication. Defendant
10 submitted the challenged communication bearing the Bates label MMERSCH00066967 to Plaintiffs
11 as part of an ongoing negotiation over whether Plaintiffs or Defendant's proposed search terms
12 should be used to identify responsive documents in Defendant's possession. Plaintiffs identified the
13 challenged communication as responsive and relevant in a draft of the Joint Status Report which
14 was submitted to Defendant on April 28.

15 3. Attached hereto as Exhibit 1 is a publicly-filed placeholder for the challenged
16 communication. This document was lodged with the Court under seal earlier this evening.

17 4. Attached hereto as Exhibit 2 is redacted version of a true and correct copy of a draft
18 of the Joint Status Report which Plaintiffs submitted to Defendant on April 28, 2016, and in which
19 Plaintiffs identified MMERSCH00066967 as responsive and relevant to their claims. A later version
20 of this document was filed with the Court on April 29, 2016, and is the subject of a motion to seal
21 filed by Defendant on April 29, 2016. An unredacted version of this document was filed with the
22 Court earlier this evening.

23 5. Attached hereto as Exhibit 3 is a true and correct copy of an email sent by
24 Defendant's counsel Marcy Lynch to Plaintiffs at 8:50 am PDT on April 29, 2016.

25 6. Attached hereto as Exhibit 4 is a true and correct copy of an email sent by
26 Defendant's counsel Marcy Lynch to Plaintiffs at 10:16 am PDT on April 29, 2016.

27 I declare under penalty of perjury that the foregoing is true and correct and this Declaration
28 is executed at San Francisco, California on May 6, 2016.

By: /s/ Kevin E. Rayhill
Kevin E. Rayhill

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of May, 2016 a true and correct copy of
**DECLARATION OF KEVIN E. RAYHILL IN SUPPORT OF PLAINTIFFS' MOTION TO
CHALLENGE ZUFFA'S PRIVILEGE DESIGNATION** was served via the United States
District Court CM/ECF system on all parties or persons requiring notice.

By: /s/ Kevin E. Rayhill